I fully agree with comments filed by Mr. Steve Hajducek, N2CKH, regarding the proposed modification. I am resubmitting his comments here for the record.

1. I oppose the RM-11392 petition by Mark A.
Miller, N5RFZ who is seeking to change Amateur Radio Service automatically controlled data stations and narrower bandwidths on HF.

2. The petition RM-11392 is counter productive with respect to the futgure of Amateur Radio Service (ARS) whereas limitations in bandwidths as applied to digital data transmissions need to be increased to permit experimentation and development of high speed data networks based on existing, open standards such as U.S. Federal and Military as well as NATO standards for waveforms and data link protocols which can be implemented on the PC Sound Device (a.k.a Sound Card) as the modem.

3. RM-11392 in my opinion would not only inhibit future experimentation and development of Amateur Radio Service digital protocols based on the PC Sound Device as the Modem but would serverly limit the application within the Amateur Radio Service of existing technology which has been in use for many years and served well for high speed communications during times of emergency.

4. The RM-11392 petition's proposed 1.5kHz bandwidth limit on data emissions is half of what is needed to implement the MIL-STD-188-110 modem which is already available in a number of free software communications tools that make use of the PC Sound Device as the Modem. These MIL-STD-188-110 software communications tools are seeing wide use by Non-U.S. based Radio Amateurs where the use of a standard PSK carrier of 1800hz with a symbol rate of 2400bps for serial tone modem operation places the bandwidth of the resulting signal at 300-3300hz requiring a 3Khz bandwidth. It is 3Khz and NOT a 1.5Khz bandwidth limitation if any that the rules need to be updated to provide.

5. The Amateur Radio Service relies upon international communications standards. Many of the present digital data communications standards require bandwidths in excess of 1.5kHz. The normal amateur radio service bandwidth limit by governments of other countries is 6kHz or more.
The Amateur Radio Service is poised to enter the next phase of the PC Sound Device Modem communicaitons revolution where U.S. Federal, U.S. Military, NATO and perhaps other world standards for modems, waveforms and adpative Forward Error Correction (FEC) and Automatic Request Query (ARQ) Data Link Protocols (DLP) will be implemented via the PC Sound Device as Software Based Modems, whereas otherwise to achieve the same level of capability very expensive hardware modems and software for same would be required. If the Amateur Radio Service is to grow its capaibilities as a state or the art Communications Service not must RM-11392 NOT be adopted, the rules that RM-11392 is geared to tighten, must instead be changed in the opposite direction for wider bandwidth and greater flexibility to allow the Radio Amateur to adapt new technology for the

betterment of the Amateur Radio Service.

6. The RM-11392 petition is an attempt at protectionism by the author of obsolete technology and practices where the author fears what he knows and loves will be replaced by newer and better technology, which its exactly what over time does and should occur within the Amateur Radio Service as change is what keeps the Amateur Radio Service vibrant and meaningful. It is the Radio Amateurs that will either embrace the new or ignore it, FCC rules need to provide for the needed experimentation and acceptance by the Amateur Radio community of what is the best technology to serve the Amateur Radio Service.
The Amateur Radio Service is moving to faster time-multiplexing digital methods to enable more stations to efficiently use the same frequency channels simultaneously or in rapid succession. These channel condition adaptive, time division techniques require at least 3kHz of bandwidth.

7. RM-11392 petition has not presented a compelling need to change the rules for Automatically Controlled Data Stations on the HF bands.

8. The FCC Amateur Radio Service's automatically controlled data sub-bands are already too narrow for the huge volume of traffic that runs on them.
If a limit of 1.5kHz bandwidth is applied, it will severely hamper the ability of amateur radio operators to share these small band segments efficiently through rapid data methods.

9. Several of the primary established HF emergency communications networks currently in service and utilized by thousands of Amateur Radio Operators in USA would be totally eliminated or hobbled if the objectives of the RM-11392 petition were to be adopted.

10. The RM-11392 petition is an attempt to limit innovation, technological advancement, and emerging emergency data communications systems within the Amateur Radio Service. Please do not let this happen by adoption of any part of RM-11392.

11. Finally, I believe that adopting a bandwidth limitation that prevents the use of MIL-STD waveforms is contrary to the interoperability intent between amateurs (RACES/ARES/etc) and government during disasters.

Sincerely,

Mr. Vic Chistiakov